# STATEMENT BY NANCY WITTENBERG, ASSISTANT COMMISSIONER NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION ON THE

# ENVIRONMENTAL JUSTICE ACT OF 2007 THE TOXIC RIGHT-TO-KNOW PROTECTION ACT BEFORE THE SUBCOMMITTEE ON ENVIRONMENT AND HAZARDOUS MATERIALS OF THE U.S. HOUSE OF REPRESENTATIVES COMMITTEE ON ENERGY AND COMMERCE OCTOBER 4, 2007

Good Morning. My name is Nancy Wittenberg and I am the Assistant Commissioner of Environmental Regulation for the New Jersey Department of Environmental Protection. Thank you for the opportunity to discuss HR 1103 and HR1055.

New Jersey is a densely populated state with a current population of close to 9,000,000 and home to some 500 facilities that use, store, generate and release toxic chemicals. Many of these facilities are located in close proximity to housing, schools and other areas where the general public are potentially impacted by these substances. Due to the size and developed state of New Jersey we do not have the luxury of keeping such facilities isolated. Thus the ability to obtain data regarding toxic substances in our state is of utmost importance.

New Jersey has a unique perspective regarding Toxic Chemical Release Inventory (TRI) reporting. New Jersey has combined implementation of several environmental laws designed to promote multi-media environmental management and public awareness. New Jersey has one unified program to implement the state's Worker and Community Right to Know Act, the state Pollution Prevention Act, and the federal Emergency Planning and Community Right to Know Act. Since 2003, any facility which is subject to reporting under the TRI criteria is required to submit a Release and Pollution Prevention Report, which provides the material balance for toxic chemicals brought on site and released from the site to the air, water, or land.

Approximately 500 New Jersey companies were, prior to 2006, required to file TRI forms (Form Rs) listing their environmental releases. However, these companies are also required to submit to DEP the Release and Pollution Prevention Report (RPPRs) listing environmental release, waste transfer, throughput, and pollution prevention progress information. Thus the changes to the TRI adopted by EPA in 2006 did not change the reporting requirements for New Jersey facilities.

The data collected on the Release and Pollution Prevention Report for NJ is similar to that required by Form R in that facilities report on quantities of toxic chemicals released to the environment. As such the federal burden reduction did not impact reporting in

New Jersey. Thus we are able to compare what data was reported under our existing framework to what would have been reported were we limited to the federal program.

The data collected in New Jersey has served the state and its residents well. At the Department of Environmental Protection we collect data detailing chemical throughput, multi-media environmental releases, on-site waste management, off site transfers and pollution prevention. The data has been used for a multitude or purposes including:

- Analysis of trends in chemical use, waste generation and releases, reported in our trends report located at: <a href="http://www.nj.gov/dep/opppc/reports/trendsmaste09.23.06r.pdf">http://www.nj.gov/dep/opppc/reports/trendsmaste09.23.06r.pdf</a>
- Reports on the top 10 success stories and failure stories with regard to reduction on releases
- Evaluation of facility operations
- Determination of Department priorities including enforcement, permitting and technical assistance.
- Assessments of geographic distribution of chemical usage as well as focusing on specific communities

Through analyzing and reporting on trends we have influenced facilities and have compelled action.

Were New Jersey subject to the existing federal program many of our efforts would not have been possible. Looking at the trends report for the ten year period ending in 2005 we identified the following that would not have been reported:

- data regarding releases and waste management for more than 1,000,000 pounds of cancer –causing compounds
- 21,000 pounds of waste arsenic.
- 122,465 pounds of styrene waste.
- 175,000 pounds of chromium waste
- Data on releases of 44 different carcinogens.
- 6773 pounds of production related waste for persistent, bioaccumulative, toxic substances over the last 4 years
- release data for 30 New Jersey municipalities
- information regarding release or other waste management activities for over 100 facilities.

Review of data for two urban areas Linden and Camden, during the 2004 to 2006 time frame, identified specific examples of where release data collected in New Jersey would have been unavailable. (See Appendix A.) These cities are highly developed areas with large populations this information is very important. In Camden release data for 4 facilities would have been unavailable. This data includes specifics regarding copper, zinc, PCBs, chorine, and lead. For Linden in 2006 data on 6 facilities would not have been available, resulting in the loss of information on PBTs including lead, as well as carcinogens.

I have heard that there is concern about the impact of reporting on small businesses. We have not encountered this in New Jersey. Our rules do not apply to facilities unless they fall in the list of regulated industry codes and have more than 10 full time employees and manufacture or process more than 25,000 pounds of a listed substance. All three criteria must be met. This is consistent with the federal requirement.

HR 1055 amends to Emergency Planning and Community Right to Know Act of 1986 to require facilities to provide data beyond simply listing hazardous substances to include specifics regarding releases. Clearly New Jersey is in support of this change. We have been collecting this data continuously for 20 years and have seen the benefits.

There are numerous examples of such benefits. The data were used to develop and undertake enforcement sweeps in two urban communities to respond to resident concerns about health impacts. The data were used to eliminate emissions of a carcinogen, hydrazine, from a facility in Newark. The data were used to reduce emissions of benzene from a refinery. Clearly, were it not for our own state program requirements, New Jersey's environment and communities would have suffered unnecessary impact. New Jersey stands as a clear case for the benefit and need for the most thorough and comprehensive toxic chemical reporting.

#### Appendix A

Summary of Environmental Justice Communities impacted by the TRI Burden Reduction Rule (all NPO<sup>1</sup> quantities reported in pounds)

The tables below are present NJ Release and Pollution Prevention Report (RPPR) data for two New Jersey cities – Camden and Linden - that might be considered Environmental Justice communities. RPPR data parallel in many ways the data reported under the TRI. (The big difference with RPPR data is that materials accounting, or chemical use, data are reported to NJDEP.) The quantities reported under NPO and Releases are comparable to that reported on TRI. The quantities support the perspective of some industry representatives that TRI is "regulation through information" (attributable to a DuPont corporate representative). The NPO and release trends are downward representing industries reductions in NPO over the years, whether attributable to pollution prevention activities, market demands (lower production possibly, but not documented), or simply an attempt to get out of the TRI reporting requirements.

The tables on the following pages detail the summaries presented here. Included are both PBTs (such as Lead and Compounds, Polycyclic Aromatic Compounds, and Benzo(g,h,i)perylene) and non-PBTs (such as Benzene, Styrene, Toluene, etc.) that are carcinogens or known to have other human health or environmental effects.

#### Camden

Report Year	# of Facilities	# of Reports	NPO <sup>1</sup>	Releases <sup>2</sup>
2004	4	9	1,236	608
2005	5	11	724	443
2006	3	7	339	292

#### Linden

Report Year	# of Facilities	# of Reports	NPO <sup>1</sup>	Releases <sup>2</sup>
2004	9	44	31,012	5,959
2005	10	48	29,717	3,834
2006	7	34	23,220	1,465

- 1. NPO nonproduct output (or production-related waste).
- 2. Releases are a component of total NPO.

Data Loss for Camden as a Result of Burden Reduction Rule based on 2004-2006 RPPR Data (all quantities reported in pounds)

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FACID	Facility Name	CAS#	Chemical Name	Calculated Us e	NPO	On-Site Releases
57699400000	F W WINTER INC & CO	N770	VANADIUM COMPOUNDS	60,439	255	255
31839200000	STATE METAL INDUSTRIES IN	7440-50-8	COPPER	816,449	231	231
57699400000	F W WINTER INC & CO	N450	MANGANESE COMPOUNDS	34,152	121	121
31839200000	STATE METAL INDUSTRIES IN	1336-36-3	POLYCHLORINATED BIPHENYI	25	25	1
90224800000	L-3 COMMUNICATIONS CORPO	7439-92-1	LEAD	1,464	604	0
93952800000	MAFCO WORLDWIDE CORPOR	N590	POLYCYCLIC AROMATIC COM	2,624	0	0
31839200000	STATE METAL INDUSTRIES IN	7439-92-1	LEAD	40,263	0	0
31839200000	STATE METAL INDUSTRIES IN	7782-50-5	CHLORINE	746,000	0	0
93952800000	MAFCO WORLDWIDE CORPOR	191-24-2	BENZO(G,H,I)PERYLENE	28	0	0
4			9	1,701,444	1,236	608

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FACID	Facility Name	CAS#	Chemical Name	Calculated Us e	NPO	On-Site Releases
57699400000	F W WINTER INC & CO	N770	VANADIUM COMPOUNDS	73,014	208	208
31839200000	STATE METAL INDUSTRIES IN	7440-50-8	COPPER	736,159	206	206
93089900000	GEORGIA PACIFIC GYPSUM L	N982	ZINC COMPOUNDS	392,441	27	27
31839200000	STATE METAL INDUSTRIES IN	1336-36-3	POLYCHLORINATED BIPHENY	26	26	1
93089900000	GEORGIA PACIFIC GYPSUM L	N420	LEAD COMPOUNDS	1,028	1	1
90224800000	L-3 COMMUNICATIONS CORPO	7439-92-1	LEAD	1,089	257	0
11900900000	CONCORD CHEMICAL CO INC	107-21-1	ETHYLENE GLYCOL	880	0	0
11900900000	CONCORD CHEMICAL CO INC	111-42-2	DIETHANOLAMINE	60,000	0	0
11900900000	CONCORD CHEMICAL CO INC	1319-77-3	CRESOL (MIXED ISOMERS)	100,000	0	0
31839200000	STATE METAL INDUSTRIES IN	7439-92-1	LEAD	39,600	0	0
31839200000	STATE METAL INDUSTRIES IN	7782-50-5	CHLORINE	726,000	0	0
5			11	2,130,237	724	443

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FACID	Facility Name	CAS#	Chemical Name	Calculated Us e	NPO	On-Site Releases
31839200000	STATE METAL INDUSTRIES IN	7440-50-8	COPPER	663,113	273	273
93089900000	GEORGIA PACIFIC GYPSUM L	N982	ZINC COMPOUNDS	911,278	18	18
31839200000	STATE METAL INDUSTRIES IN	1336-36-3	POLYCHLORINATED BIPHENYI	27	27	1
93089900000	GEORGIA PACIFIC GYPSUM L	N420	LEAD COMPOUNDS	1,226	0	0
90224800000	L-3 COMMUNICATIONS CORPO	7439-92-1	LEAD	394	20	0
31839200000	STATE METAL INDUSTRIES IN	7439-92-1	LEAD	40,300	0	0
31839200000	STATE METAL INDUSTRIES IN	7782-50-5	CHLORINE	872,000	0	0
3			7	2,488,338	339	292

Data Loss for Linden as a Result of Burden Reduction Rule based on 2004 RPPR Data

(all quantities reported in pounds)

FACID	Facility Name	CAS#	Chemical Name	Calculated Use	NPO	On-Site Releases
82980100000	CONOCOPHILLIPS CO	N495	NICKEL COMPOUNDS	4,955	4,955	1,349
33757700004	INFINEUM USA	115-07-1	PROPYLENE [PROPENE]	1,307	1,307	1,307
00004010001	GENERAL MOTORS CORPORA	107-21-1	ETHYLENE GLYCOL	397,572	1,164	855
00004010001	GENERAL MOTORS CORPORA	110-54-3	N-HEXANE	22,962	691	596
15244700000	LUBRIZOL DOCK RESINS	80-62-6	METHYL METHACRYLATE	638,672	719	309
82980100000	CONOCOPHILLIPS CO	74-90-8	HYDROGEN CYANIDE [HYDRO	29,290	290	290
82980100000	CONOCOPHILLIPS CO	N010	ANTIMONY COMPOUNDS	18,749	749	192
00004010001	GENERAL MOTORS CORPORA	71-43-2	BENZENE	18,791	217	152
15244700000	LUBRIZOL DOCK RESINS	96-33-3	METHYL ACRYLATE	251,097	414	135
82980100000	CONOCOPHILLIPS CO	67-56-1	METHANOL	330,131	131	131
82980100000	CONOCOPHILLIPS CO	N100	COPPER COMPOUNDS [WITH I	2,626	2,626	120
82980100000	CONOCOPHILLIPS CO	127-18-4	TETRACHLOROETHYLENE [PE	56,110	110	110
00004010001	GENERAL MOTORS CORPORA	1634-04-4	METHYL TERT-BUTYL ETHER	67,185	465	89
73021500002	COSMED GROUP INC	75-21-8	ETHYLENE OXIDE	73,095	73	73
82980100000	CONOCOPHILLIPS CO	N420	LEAD COMPOUNDS	5,981	1,681	51
15244700000	LUBRIZOL DOCK RESINS	100-42-5	STYRENE	434,449	3,027	41
15244700000	LUBRIZOL DOCK RESINS	141-32-2	BUTYL ACRYLATE	213,003	174	35
00004010001	GENERAL MOTORS CORPORA	110-82-7	CYCLOHEXANE	22,394	107	28
15244700000	LUBRIZOL DOCK RESINS	108-10-1	METHYL ISOBUTYL KETONE	98,977	1,828	21
15244700000	LUBRIZOL DOCK RESINS	140-88-5	ETHYL ACRYLATE	35,848	238	20
15244700000	LUBRIZOL DOCK RESINS	107-13-1	ACRYLONITRILE	15,193	16	16
73021500002	COSMED GROUP INC	75-56-9	PROPYLENE OXIDE	11,755	12	12
00004010001	GENERAL MOTORS CORPORA	N982	ZINC COMPOUNDS	17,181	4,549	9
82980100000	CONOCOPHILLIPS CO	N590	POLYCYCLIC AROMATIC COM	1,533	1,533	5
15244700000	LUBRIZOL DOCK RESINS	79-10-7	ACRYLIC A CID	102,856	10	3
82980100000	CONOCOPHILLIPS CO	1313-27-5	MOLYBDENUM TRIOXIDE	2,613	313	3
15244700000	LUBRIZOL DOCK RESINS	71-36-3	N-BUT YL ALCOHOL	17,061	3,090	2
15244700000	LUBRIZOL DOCK RESINS	85-44-9	PHTHALIC ANHYDRIDE	39,381	35	2
82980100000	CONOCOPHILLIPS CO	N458	MERCURY COMPOUNDS	49	37	1
15244700000	LUBRIZOL DOCK RESINS	111-42-2	DIETHANOLAMINE	60,529	4	1
15244700000	LUBRIZOL DOCK RESINS	N120	DIISOCYANATES	10,191	2	1
33757700004	INFINEUM USA	N420	LEAD COMPOUNDS	1	1	0
00585211018	PSEG FOSSIL LLC	N590	POLYCYCLIC AROMATIC COM	475	338	0
82980100000	CONOCOPHILLIPS CO	191-24-2	BENZO(G,H,I)PERYLENE	46	46	0
00004010001	GENERAL MOTORS CORPORA	N420	LEAD COMPOUNDS	1,799	60	0
57836900000	CITGO PETROLEUM CORPOR	1336-36-3	POLYCHLORINATED BIPHENYI	0	0	0
57836900000	CITGO PETROLEUM CORPOR	N420	LEAD COMPOUNDS	1,382	0	0
83747200000	TOTAL LUBRICANTS USA INC	107-21-1	ETHYLENE GLYCOL	65,338	0	0
83747200000	TOTAL LUBRICANTS USA INC	N230	GLYCOL ETHERS (EXCEPT SU	26,649	0	0
83747200000	TOTAL LUBRICANTS USA INC	N583	POLYCHLORINATED ALKANES	150,469	0	0
83747200000	TOTAL LUBRICANTS USA INC	N982	ZINC COMPOUNDS	14,375	0	0
85313000001	GULF OIL LIMITED PARTNERS	191-24-2	BENZO(G,H,I)PERYLENE	4,506	0	0
85313000001	GULF OIL LIMITED PARTNERS	7439-92-1	LEAD	236	0	0
85313000001	GULF OIL LIMITED PARTNERS	N590	POLYCYCLIC AROMATIC COM	23,510	0	0
9			44	3,290,321	31,012	5,959

Data Loss for Linden as a Result of Burden Reduction Rule based on 2005 RPPR Data

(all quantities reported in pounds)

FACID	Facility Name	CAS#	Chemical Name	Calculated Use	NPO	On-Site Releases
00004010001	GENERAL MOTORS CORPORA	67-56-1	METHANOL	19,390	2,106	1,492
00004010001	GENERAL MOTORS CORPORA	108-88-3	TOLUENE	80,631	908	416
00004010001	GENERAL MOTORS CORPORA	110-54-3	N-HEXANE	18,565	461	344
15244700000	LUBRIZOL DOCK RESINS	80-62-6	METHYL METHACRYLATE	644,792	525	286
33757700004	INFINEUM USA	110-54-3	N-HEXANE	3,493	3,493	228
82980100000	CONOCOPHILLIPS CO	N010	ANTIMONY COMPOUNDS	24,462	1,462	163
82980100000	CONOCOPHILLIPS CO	67-56-1	METHANOL	360,160	160	160
82980100000	CONOCOPHILLIPS CO	127-18-4	TETRACHLOROETHYLENE [PE	92,135	135	135
15244700000	LUBRIZOL DOCK RESINS	96-33-3	METHYL ACRYLATE	209,478	187	101
00004010001	GENERAL MOTORS CORPORA	71-43-2	BENZENE	14,658	179	82
00004010001	GENERAL MOTORS CORPORA	1634-04-4	METHYL TERT-BUTYL ETHER	65,672	429	77
73021500002	COSMED GROUP INC	75-21-8	ETHYLENE OXIDE	64,745	65	65
82980100000	CONOCOPHILLIPS CO	N420	LEAD COMPOUNDS	6,424	1,924	45
15244700000	LUBRIZOL DOCK RESINS	140-88-5	ETHYL ACRYLATE	279,709	196	33
15244700000	LUBRIZOL DOCK RESINS	100-42-5	STYRENE	292,278	51	31
73021500002	COSMED GROUP INC	75-56-9	PROPYLENE OXIDE	31,439	31	31
15244700000	LUBRIZOL DOCK RESINS	141-32-2	BUTYL ACRYLATE	191,694	150	27
00004010001	GENERAL MOTORS CORPORA	110-82-7	CYCLOHEXANE	18,242	138	21
15244700000	LUBRIZOL DOCK RESINS	95-63-6	1,2,4-TRIMETHYLBENZENE	101,377	3,291	20
15244700000	LUBRIZOL DOCK RESINS	108-10-1	METHYL ISOBUTYL KETONE	59,558	939	16
15244700000	LUBRIZOL DOCK RESINS	107-13-1	ACRYLONITRILE	21,209	14	14
82980100000	CONOCOPHILLIPS CO	74-90-8	HYDROGEN CYANIDE [HYDRO	180,013	13	13
15244700000	LUBRIZOL DOCK RESINS	100-41-4	ET HYLBE NZENE	68,549	4,765	12
82980100000	CONOCOPHILLIPS CO	N590	POLYCYCLIC AROMATIC COM	2,711	2,711	5
15244700000	LUBRIZOL DOCK RESINS	N230	GLYCOL ETHERS (EXCEPT SU	74,440	2,319	5
15244700000	LUBRIZOL DOCK RESINS	71-36-3	N-BUT YL ALCOHOL	16,531	2,258	3
15244700000	LUBRIZOL DOCK RESINS	78-84-2	ISOBUTYRALDEHYDE	16,423	391	3
15244700000	LUBRIZOL DOCK RESINS	79-10-7	ACRYLIC A CID	89,521	9	2
82980100000	CONOCOPHILLIPS CO	N458	MERCURY COMPOUNDS	63	20	1
00004010001	GENERAL MOTORS CORPORA	N420	LEAD COMPOUNDS	1,472	25	1
15244700000	LUBRIZOL DOCK RESINS	85-44-9	PHTHALIC ANHYDRIDE	16,434	17	1
33757700004	INFINEUM USA	N420	LEAD COMPOUNDS	16	16	0
82980100000	CONOCOPHILLIPS CO	191-24-2	BENZO(G,H,I)PERYLENE	72	72	0
00004010001	GENERAL MOTORS CORPORA	107-21-1	ETHYLENE GLYCOL	194,937	255	0
00585211018	PSEG FOSSIL LLC	7632-00-0	SODIUM NITRITE	22,000	0	0
15244700000	LUBRIZOL DOCK RESINS	111-42-2	DIETHANOLAMINE	17,921	2	0
57836900000	CITGO PETROLEUM CORPOR	107-21-1	ETHYLENE GLYCOL	19,947	0	0
57836900000	CITGO PETROLEUM CORPOR	N420	LEAD COMPOUNDS	1,224	0	0
68493000007	BRUNSWICK HOT MIX CORP	1344-28-1	ALUMINUM OXIDE (FIBROUS F	105,000	0	0
83747200000	TOTAL LUBRICANTS USA INC	107-21-1	ETHYLENE GLYCOL	45,500	0	0
83747200000	TOTAL LUBRICANTS USA INC	N230	GLYCOL ETHERS (EXCEPT SU	25,242	0	0
83747200000	TOTAL LUBRICANTS USA INC	N583	POLYCHLORINATED ALKANES	201,777	0	0
83747200000	TOTAL LUBRICANTS USA INC	N982	ZINC COMPOUNDS	92,400	0	0
85313000001	GULF OIL LIMITED PARTNERS	191-24-2	BENZO(G,H,I)PERYLENE	4,799	0	0
85313000001	GULF OIL LIMITED PARTNERS	7439-92-1	LEAD	245	0	0
85313000001	GULF OIL LIMITED PARTNERS	N590	POLYCYCLIC AROMATIC COM	25,500	0	0
10			46	3,822,847	29,717	3,834

 $Data\ Loss\ for\ Linden\ as\ a\ Result\ of\ Burden\ Reduction\ Rule\ based\ on\ 2006\ RPPR\ Data$ 

(all quantities reported in pounds)

FACID	Facility Name	CAS#	Chemical Name	Calculated Us e	NPO	On-Site Releases
15244700000	LUBRIZOL DOCK RESINS	80-62-6	METHYL METHACRYLATE	473,501	756	286
82980100000	CONOCOPHILLIPS CO	N010	ANTIMONY COMPOUNDS	22,816	3,816	232
15244700000	LUBRIZOL DOCK RESINS	96-33-3	METHYL ACRYLATE	118,272	341	206
82980100000	CONOCOPHILLIPS CO	67-56-1	METHANOL	290,184	184	184
15244700000	LUBRIZOL DOCK RESINS	100-42-5	STYRENE	224,287	380	130
82980100000	CONOCOPHILLIPS CO	127-18-4	TETRACHLOROETHYLENE [PE	120,098	98	98
82980100000	CONOCOPHILLIPS CO	N420	LEAD COMPOUNDS	8,840	640	64
73021500002	COSMED GROUP INC	75-21-8	ETHYLENE OXIDE	55,079	56	56
15244700000	LUBRIZOL DOCK RESINS	108-10-1	METHYL ISOBUTYL KETONE	59,704	872	33
73021500002	COSMED GROUP INC	75-56-9	PROPYLENE OXIDE	28,811	30	30
15244700000	LUBRIZOL DOCK RESINS	85-44-9	PHTHALIC ANHYDRIDE	24,206	42	25
15244700000	LUBRIZOL DOCK RESINS	141-32-2	BUTYL ACRYLATE	110,898	132	20
15244700000	LUBRIZOL DOCK RESINS	140-88-5	ETHYL ACRYLATE	266,318	175	15
15244700000	LUBRIZOL DOCK RESINS	107-13-1	ACRYLONIT RILE	20,304	16	13
00000042261	CONOCO PHILLIPS	107-21-1	ETHYLENE GLYCOL	11,109	12	12
00000042261	CONOCO PHILLIPS	N230	GLYCOL ETHERS (EXCEPT SU	36,675	12	12
82980100000	CONOCOPHILLIPS CO	74-90-8	HYDROGEN CYANIDE [HYDRO	150,011	11	11
15244700000	LUBRIZOL DOCK RESINS	100-41-4	ET HYLBE NZENE	57,981	4,151	10
15244700000	LUBRIZOL DOCK RESINS	67-56-1	METHANOL	15,779	2,395	10
15244700000	LUBRIZOL DOCK RESINS	N230	GLYCOL ETHERS (EXCEPT SU	64,778	4,591	9
82980100000	CONOCOPHILLIPS CO	N590	POLYCYCLIC AROMATIC COM	2,887	2,887	5
15244700000	LUBRIZOL DOCK RESINS	71-36-3	N-BUT YL ALCOHOL	24,499	816	1
15244700000	LUBRIZOL DOCK RESINS	79-10-7	ACRYLIC ACID	56,929	55	1
82980100000	CONOCOPHILLIPS CO	N458	MERCURY COMPOUNDS	56	14	1
00000042261	CONOCO PHILLIPS	N590	POLYCYCLIC AROMATIC COM	53,010	5	1
33757700004	INFINEUM USA	N420	LEAD COMPOUNDS	9	9	0
82980100000	CONOCOPHILLIPS CO	191-24-2	BENZO(G,H,I)PERYLENE	229	229	0
00000042261	CONOCO PHILLIPS	191-24-2	BENZO(G,H,I)PERYLENE	10,960	1	0
15244700000	LUBRIZOL DOCK RESINS	111-42-2	DIETHANOLAMINE	19,017	475	0
15244700000	LUBRIZOL DOCK RESINS	78-84-2	ISOBUTYRALDEHYDE	16,341	19	0
57836900000	CITGO PETROLEUM CORPOR	N420	LEAD COMPOUNDS	1,079	0	0
85313000001	GULF OIL LIMITED PARTNERS	191-24-2	BENZO(G,H,I)PERYLENE	4,418	0	0
85313000001	GULF OIL LIMITED PARTNERS	7439-92-1	LEAD	237	0	0
85313000001	GULF OIL LIMITED PARTNERS	N590	POLYCYCLIC AROMATIC COM	24,361	0	0
7			34	2,373,683	23,220	1,465